

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
ALBANY DIVISION**

Jerroma Williams,

Plaintiff,

vs.

Collection & Billing Services, Inc. d/b/a
Credit Bureau of Southwest Georgia,
a domestic profit corporation,

Defendant.

Case No.:

COMPLAINT

JURY TRIAL DEMAND

NOW COMES THE PLAINTIFF, JERROMA WILLIAMS, BY AND
THROUGH COUNSEL, Matthew Landreau, and for his Complaint against the
Defendant, pleads as follows:

JURISDICTION

1. This court has jurisdiction under the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. §1692k(d) and 28 U.S.C. §§1331,1337.

VENUE

2. The transactions and occurrences which give rise to this action occurred in the City of Albany, Dougherty County, Georgia.
3. Venue is proper in the Middle District of Georgia, Albany Division.

PARTIES

4. Plaintiff is a natural person residing in City of Albany, Dougherty County, Georgia.
5. The Defendant to this lawsuit is Collection & Billing Services, Inc. d/b/a Credit Bureau of Southwest Georgia, which is a domestic profit corporation that conducts business in the State of Georgia.

GENERAL ALLEGATIONS

6. Defendant is attempting to collect two consumer type debts allegedly owed by Plaintiff to Phoebe Physician Group Inc. The first debt is in the amount of \$59.00 and the second debt is in the amount of \$50.00 (the “alleged Debts”).
7. Plaintiff disputes the alleged Debts.
8. On March 20, 2020, Plaintiff obtained his Equifax credit disclosure and noticed Defendant reporting the alleged Debts.
9. On or about April 20, 2020, Plaintiff sent Defendant a letter disputing the alleged Debts.
10. On June 15, 2020, Plaintiff obtained his Equifax credit disclosure and noticed Defendant last reported the tradeline reflected by the alleged Debts to May 3, 2020 and failed or refused to flag its trade line as disputed, in violation of the FDCPA.

11. In the credit reporting industry, data furnishers, such as the Defendant, communicate electronically with the credit bureaus.
12. Defendant had more than ample time to instruct Experian, Equifax, and Trans Union to flag its trade line as Disputed.
13. Defendant's inaction to have its trade line on Plaintiff's credit report flagged as disputed was either negligent or willful.
14. Plaintiff suffered pecuniary and emotional damages as a result of Defendant's actions. His credit report continues to be damaged due to the Defendant's failure to properly report the associated trade line.

VIOLATION OF THE FAIR DEBT COLLECTION PRACTICES ACT

15. Plaintiff reincorporates the preceding allegations by reference.
16. At all relevant times, Defendant, in the ordinary course of its business, regularly engaged in the practice of collecting debts on behalf of other individuals or entities.
17. Plaintiff is a "consumer" for purposes of the FDCPA, and the account at issue in this case is a consumer debt.
18. Defendant is a "debt collector" under the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. §1692a(6).

19. Defendant's foregoing acts in attempting to collect this alleged debt violated 15 U.S.C. §1692e(8) of the FDCPA by communicating to any person credit information, which is known to be false or should be known to be false, including failure to report a disputed debt as disputed.

20. To date, and a direct and proximate cause of the Defendant's failure to honor its statutory obligations under the FDCPA, the Plaintiff has continued to suffer from a degraded credit report and credit score.

21. Plaintiff has suffered economic, emotional, general, and statutory damages as a result of these violations of the FDCPA.

WHEREFORE, PLAINTIFF PRAYS that this court grant him a judgment against Defendant for actual damages, costs, interest, and attorneys' fees.

DEMAND FOR JUDGMENT RELIEF

Accordingly, Plaintiff requests that the Court grant him the following relief against the Defendant:

- a. Actual damages;
- b. Statutory damages;
- c. Statutory costs and attorneys' fees.

JURY DEMAND

Plaintiff hereby demands a trial by Jury.

DATED: August 24, 2020

By: /s/ **Matthew Landreau**

Matthew Landreau

Bar Number 301329

22142 West Nine Mile Road

Southfield, MI 48033

Telephone: (248) 353-2882

Facsimile: (248) 353-4840

E-Mail: matt@crlam.com

Attorneys for Plaintiff,

Jerroma Williams